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SEP 14 1995

WPAQ

10,000 W
740 KILOHERTZ

FCC MAIL ROOM

P. O. BOX 907
MOUNT AIRY, NORTH CAROLINA 27030
(919) 786-6111

NONDIRECTIONAL
CLEAR CHANNEL

September 12, 1995

Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: DARS

Dear Secretary:

WPAQ is a daytime only station at 740 KHz. Since 1948 WPAQ has been broadcasting a wide variety of programs which includes folk-mountain music, local news, religious programs (national and local) and various types of music. By offering to a wide rural area a wide choice of programming we have been able to attract different types of audiences during different time segments. Each segment is vital to our survival. We operate on a very small margin of profit.

In contemplating DARS, we are concerned that enormous competition may cause us to lose the financial ability to provide weather information, local news, local religious programs, farm programs, and other local community programs. Even losing one segment such as our national religious programs would put us in the red.

At present our city of license is about 7,600 people, and receives over 20 radio broadcast signals. Why do we need more?

If the FCC is determined to license DARS, then you should auction off the channels to raise much needed money for the government. It simply makes no sense to give away spectrum that is more than all AM and FM spectrum combined. It's a windfall for the four applicants while destroying us. Also, I don't think it's right or fair to have only four licensees. Why not open up process for more applications? Subscription only radio would lessen the damage somewhat.

I have operated WPAQ in what I felt was the local community interest for nearly 50 years. My whole family has been involved. I feel very proud about our station. Now, my son, Kelly is also at WPAQ with me.

Please do not destroy the local service which has taken nearly 50 years to build.

Respectfully,

RADIO STATION WPAQ

Ralph D. Epperson
Ralph D. Epperson
Licensee

RDE/leb

CC: Chairman Reed Hundt, Commissioner James Quello, Commissioner Andrew Barrett,
Commissioner Susan Ness, Commissioner Rachelle Chong

Member
National Association of Broadcasters

Member
Radio Advertising Bureau

... making a difference

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NRB

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National Religious Broadcasters

September 13, 1995

Serving Since 1944

95-91

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 "M" Street, NW
Washington, D. C. 20554

DOCKET FILE COPY ORIGINAL

Re: DARS

Dear Chairman Hundt:

This is in response to the Commission's request for comments on DARS. The National Religious Broadcasters, with our 800 members nationwide including over 200 radio stations, hereby states its opposition to the DARS proposal.

Our strong opposition is based on the following concerns:

1 - Threat to local religious stations. Religious stations derive an average of about 50% of their income from national programs and advertisers. Typically, a religious station billing \$25,000 per month probably gets about \$14,000 of that from national programs such as Focus on the Family and Thru the Bible. The balance of the income comes from local churches and advertisers. The national income enables the station to make time available to local churches, local advertisers and other local organizations at an affordable rate. Should DARS realize its obvious but unstated goal of being the only source for these national programs, the local stations without national income would be forced to sharply curtail or discontinue their local church programs and other local programs. The DARS siphoning of national revenues would make local service unsustainable. Thus a local station, serving the local community, could be destroyed. Religious stations typically operate at break even or very thin profits. Any significant erosion of audience or income would be disastrous. We will be happy to provide (on a confidential basis) examples of this.

2 - Local vs National. Local community involvement is very important to religious stations. In particular, they endeavor to encourage family attendance at local church services and related activities. They are involved in most community activities such as local homeless shelters, blood drives and a multitude of other community activities that help to bring different families together in local causes. We feel this is healthy for the community. This localism, the foundation on which the FCC has been issuing radio licenses for sixty years, is threatened by DARS. There seems to be no real compelling public interest reason to turn away from this localism at a time when our communities need revitalizing.

E. Brandt Gustavson, L.L.D., President

3 - Concentration of control. Under one proposal, DARS would be licensed to only four (4) organizations although the band width is over twice that of the AM and FM bands combined. The combination of this concentration of control in only four licensees and the national nature of the service would be harmful to localism, including local expression and local ownership of radio.

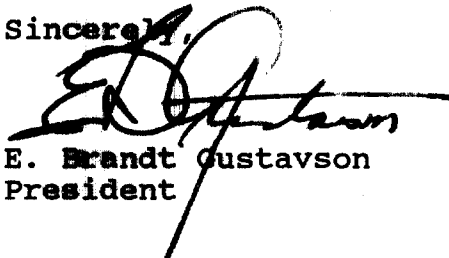
4 - Content. It is our strong feeling there needs to be some accountability as to the moral content of programming. There is reason to fear that, lacking some basic moral guidelines, DARS could become a source for the promotion of that which is immoral and inconsistent with widely held American values.

5 - Selection of Licenses. There is plenty of competition in radio today; in fact, it is the most competitive service which the Commission regulates. Many communities have literally dozens of radio stations serving them at this time. There is no compelling need for new radio service, especially if it comes in such wholesale fashion. On the other hand, the government tells us that there is tremendous need to raise revenues, and auctioning spectrum is an obvious way to do it. This is a huge volume of spectrum (50 MHz), and the public should be permitted to bid on it. Then, the winners can decide if they want to provide a satellite radio service, a PCS-like telephone service, or some data transmission service.

6 - Type of service. The DARS service, if authorized, should be subscription-only. The proponents of DARS have said that they believe that their service will be "complementary" to radio, not competitive to it. If so, they should be willing to accept a requirement that all DARS service would be subscription-based. Then it will not compete directly with the free, over-the-air, universal radio service that we have in America. Instead, it will offer those who wish to pay a premium for their special programming needs a vehicle through which to do that.

National Religious Broadcasters does not oppose progress in communication technology, but we feel that any meaningful and fair FCC action must address these concerns.

Sincerely,



E. Brandt Gustavson
President